

24 A. Kathy Korona.

25 Q. And she is subordinate to Kathy Flynn Miles?
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1 A. Actually, Debby Nightingale.

2 Q. So you switched from reporting to Kathy Flynn
3 Miles to Debby Nightingale?

4 A. No, no. It goes me, Kathy Korona, Debby
5 Nightingale, Kathy Flynn Miles.

6 Q. When did those two people, Kathy Korona and
7 Debby Nightingale, get inserted between you and Kathy
8 Flynn Miles?

9 A. I believe Kathy Korona was in like October, and
10 I believe Debby was in the middle of November.

11 Q. Were they new hires to the program, were they?

12 A. Kathy Korona has been with the company -- no,
13 she is not a new hire.

14 Q. Had they been in this industry market area prior
15 to that time?

16 A. Kathy Korona had, yes.

17 Q. Was Kathy Korona working on MCI matters prior to
18 October?

19 A. Oh, yes.

20 Q. But starting in October, your immediate
21 supervisor became Kathy Korona rather than Kathy Flynn
22 Miles?

23 A. Correct.

24 Q. Why was that?

25 A. Because we wanted to add people to the account

14 Q. I don't know if you can do this. If there is a
15 typical week during the time period since September, can
16 you describe the types of things that you would do in a
17 typical week in your current position?

18 A. Yes. There would be daily meetings. There was
19 daily conference calls -- which we quit now, we don't have
20 them daily anymore -- with Sandy McGinn, David Williams
21 and sometimes Loren Pfau would be in them, every day at
22 2:30 to help MCI with any questions that they had, say,
23 whether, for example, if they could hunt, roll-over calls
24 to different locations. We did that daily on Wednesdays
25 and Thursdays. We had 1:00 o'clock calls.

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1 Wednesdays with markets which would be the Betty
2 Johnson organization, Thursdays with business markets
3 which would be Annette Fallen and Sandy McGinn. Weekly
4 meetings to discuss how the ordering was going, if they
5 were running into problems with certain things, problems
6 on their orders, MCI orders, and there was a lot of voice
7 mails, internal voice mails of -- it's a new -- I mean,
8 this is a whole new business, so there is always a
9 learning experience, I mean, there's something new that's
10 happening.

11 Q. When you say internal voice mails, people within
12 Pacific Bell?

13 A. Would leave for me, yes.

14 Q. That would be what, addressing problems that MCI
15 would have?

16 A. No. Anything that has to do with resale; it's a
17 huge thing, local service is huge. So there is a lot of
18 things that come up where I would receive voice mails on,
19 say, a process that's in place. Everything is new, so it
20 was like a learning experience every day. It's a new
21 business.

22 Q. The resale business is a new business; is that
23 right?

24 A. Correct.

25 Q. It's not one that anyone at Pacific had
0023

1 previously done before?

2 A. Correct.

3 Q. So you told us you had daily conference calls
4 and Wednesdays and Thursdays you had weekly conference
5 calls with two different divisions or areas within MCI?

6 A. Yes.

7 Q. What else regularly would you do? Did you have
8 other regular meetings among the other --

9 A. We had NDM calls, something data mover, but I
10 don't remember.

11 MR. CHANG: Network.

12 THE WITNESS: Thank you.

13 MR. McDONALD: Q. Who would be involved in
14 those?

15 A. Kathy Korona, sometimes Debby Nightingale,
16 Kerrin Beland from Pacific Bell, Paul Gerkim, I think his
17 name was. I was more the secondary person. I did not

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1 team on resale.

2 Q. To the MCI account team?

3 A. Correct.

4 Q. And why did you want to add people? Why did

5 Pacific Bell want to add people to the account team?

6 A. Because resale -- the involvement of the account

7 team took more than one person, so we wanted to make sure

8 that we were there for MCI and could support them.

9 Q. Prior to September, the plan had been that you

10 would be the RMC and you would report directly to Kathy

11 Flynn Miles; is that right?

12 A. Correct.

13 Q. But then in October, because of the amount of

14 work that was required, two additional people were then

15 added; is that right?

16 A. Correct.

17 Q. And they were put in at levels superior to you

18 between you and Kathy Flynn Miles?

19 A. Correct.

20 Q. Now, going back to, again, before September '96,

21 the RMC's went through training; is that what you told us?

22 A. We went to workshops with the CLC's.

23 Q. So you were being trained at the same time that

24 the CLC's were being trained?

25 A. I was attending the workshops with the CLC's,

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1 with MCI, correct.

2 Q. Had you had any training separate from the

3 workshops you attended with MCI?

4 A. No.

5 Q. And you were not given any other instruction
6 about how the resale operation would function separate
7 from what MCI was instructed?

8 A. Oh, yes, we were. It wasn't actual training
9 classes, I guess I need to change that. We didn't have
10 training. We didn't have actual training classes. We had
11 process people that would talk to us. People that were
12 involved with the RMC meetings would come in and talk to
13 us about different issues that were happening in resale.
14 But I am not part of the LISC, I am separate from that.

15 Q. Right. Well, during the -- prior to September
16 1996, were you given instruction about what your functions
17 would be in your current position?

18 A. Not exactly, no.

19 Q. Were there discussions with people within
20 Pacific Bell as to what issues that you should anticipate
21 needing to address in your role?

22 A. Yes.

23 MR. KOLTO-WININGER: I'm sorry, with her,
24 discussions with her?

25 MR. McDONALD: Yes.
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1 THE WITNESS: Can you repeat that again? I'm
2 sorry.

3 MR. McDONALD: Q. Prior to September 1996, were
4 there discussions within Pacific Bell that you are aware

5 of that discussed the issues that you would anticipate

6 having to address in your current position?

7 A. Yes.

8 Q. When did those discussions occur?

9 A. I don't know exact time frames.

10 Q. Was it sometime within February '96 and

11 September '96?

12 A. It was an ongoing thing to this day.

13 Q. I am trying to -- I was trying to sort of

14 define, put some milestones and try to figure out what --

15 prior to the actual submission of live orders, what kind

16 of issues did you anticipate, you personally, anticipate

17 would be raised that you'd have to address in your

18 position, when resale actually commenced.

19 A. We weren't -- as RMC's, we weren't exactly sure

20 because everybody could have different issues depending on

21 the volumes and different things.

22 Q. But there was no seminar, workshop, tutorial

23 given to you as an RMC that said, Here is a universe of 12

24 issues that we anticipate will arise once live orders

25 commence?

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1 A. No.

2 Q. You were never given anything like that?

3 A. No.

4 Q. Were you given any documents to assist you in

5 performing your function as an RMC by Pacific Bell?

6 A. Yes.

7 Q. And what were you given?

8 A. There is a lot of different things, such as Cleo
9 training, C-I-e-o.

10 Q. All caps?

11 A. Right.

12 Q. Can you explain what that stands for?

13 A. Cleopatra.

14 MR. KOLTO-WININGER: It's not an acronym.

15 THE WITNESS: Sorry, it's not part of CESAR.

16 MR. McDONALD: Q. Do you want to spell CESAR?

17 A. That is an acronym, C-E-S-A-R, I believe.

18 Q. Can you describe generally what Cleopatra and
19 CESAR do? What functions do they perform?

20 A. CESAR is used for your long distance side of the
21 house for PIC, PIC things, I believe. And Cleopatra,
22 Cleo, what we call it, is only for resale, it's a vehicle
23 to order. You could order migrations as is through, you
24 could check street address validation, feature

25 availabilities, and PIC information, I believe. So
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1 there's documents on that that we share with CLC's and
2 they would train.

3 I have different documents regarding processes,
4 resale, user's guide. I also use the CLC handbook, it's
5 called, that we actually give to the CLC's that update it,
6 I believe, on a weekly basis. That holds all the
7 information in that, that I was pretty familiar with at
8 that time.

9 Q. Does that describe the material that you were
10 provided by Pacific Bell to assist you in preparing for
11 the RMC?

12 A. No, there wasn't an exact piece of paper
13 provided by Pacific Bell. There were processes that were
14 provided to me. And the way things were going to be done,
15 voice mails, cooperative testing calls, I was not in
16 charge of that. I just sat -- I was more, for example,
17 cooperative testing, okay. I was on those calls. But I
18 was not doing the cooperative testing, I was there to make
19 sure that, say, if I thought there was something that
20 needed to be done to that, that I would be aware of that.
21 I was looking on MCI's behalf.

22 Q. Prior to September 1996 when the live orders
23 commenced, are you aware of anyone at Pacific Bell,
24 yourself or anyone else, compiling a list or some --
25 creating some kind of a document that identified the
0033

1 likely issues that were expected to arise when live
2 ordering commenced?

3 A. I don't know.

4 Q. You didn't do anything like that?

5 A. No, I did not.

6 Q. You don't know if any of your superiors did?

7 A. I would be guessing for sure to say that.

8 Q. Did the test experience identify certain issues
9 that were likely to arise with the submission of live
10 orders?

11 A. Yes.

12 Q. What were those?

13 A. I don't know all the exact issues. That was the
14 cooperative testing person that would have that.

15 Q. Were there documents that were created as a
16 result of this test?

17 A. I believe so.

18 Q. Do you know who has those?

19 A. I don't know for sure who has those, no. I --
20 they weren't -- they were in a fax back mode. I don't
21 know that, I couldn't pull those. I am not sure. I am
22 not sure if they were still there, though.

23 Q. Was there any individual who was responsible for
24 the training to be given to the RMC's for all the carriers
25 that you are aware of?

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1 A. No, not that I am aware of.

2 Q. And who generally was in charge of -- are there
3 multiple RMC's for various carriers?

4 A. One RMC per carrier.

5 Q. How many RMC's are there, do you know?

6 A. I believe there's like 10, 12, something like
7 that.

8 Q. Were they all hired or started in their position
9 at about the same time you did?

10 A. I was one of the first to start.

11 Q. Over what period of time were the others added?

12 MR. KOLTO-WININGER: Can we go off the record

13 for a second here.

14 MR. McDONALD: Sure.

15 (Discussion off the record.)

16 MR. McDONALD: Q. You want to correct something
17 about your last answer?

18 A. Yes. Some of the larger carriers have one RMC.
19 Some other RMC's, not myself, could have more than one
20 company that they are working with; but me, I only work
21 for MCI.

22 Q. Do you know how many RMC's there are currently?

23 A. I think there's like 10.

24 Q. And were all 10 in place by September of 1996,
25 do you know?

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1 A. I am not positive of that.

2 Q. Do you know how many were in place by September
3 of '96?

4 A. Not for sure, no.

5 Q. Were there at least five or --

6 A. I believe there was about at least five, yes.

7 Q. Did those RMC's who were in position at that
8 time, did they have a single superior that they reported
9 to?

10 A. I believe -- I don't know what the other account
11 teams did.

12 Q. So you are not familiar with any training that
13 was given to the RMC's?

14 A. Yes. We went to several workshops with the

15 CLC's, with the RMC -- the RMC is different from the LISC.

16 We are just -- we did go along with the CLC's to whatever
17 they went; I was there present.

18 Q. But, make sure I understand, there was not a
19 single uniform body of training that was given to all
20 RMC's across the various carriers, to your knowledge?

21 A. Not that I am aware of, no.

22 Q. Now, you talked about a variety of -- since
23 September of '96, you had a variety of either conference
24 calls daily or weekly with MCI representatives; is that
25 right?

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1 A. Yes.

2 Q. And the purpose of those calls was to identify
3 current issues that had developed in connection with MCI's
4 submission of resale orders to Pacific?

5 A. Current problems either on MCI's side or Pacific
6 Bell's side that we wanted to fix.

7 Q. Did you or anyone at Pacific Bell create any
8 documents growing out of those conference calls or
9 meetings?

10 A. There were, I believe, a couple sent to MCI,
11 yes.

12 Q. So the only documents you created you sent to
13 MCI?

14 A. They also sent them back to us.

15 Q. Did you create any documents that you did not
16 give to MCI?

17 A. Did I personally?

18 Q. Right, right.

19 A. Regarding that meeting?

20 Q. Regarding any of these meetings. If you had a

21 conference call -- if you had a conference call and it

22 identified five issues that had come up in a given day,

23 did you take notes or create some kind of a memorandum for

24 Pacific Bell purposes?

25 A. I don't believe so; it was on the document we
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1 gave to you.

2 Q. And when you refer to the document that you

3 provided to MCI, is that an e-mail message that went back

4 and forth?

5 A. Yes.

6 Q. Was that the principal way that written

7 communications were made between MCI and Pacific Bell to

8 deal with these problems that you were addressing?

9 A. Yes.

10 Q. Was there any other written record made of those

11 problems, to your knowledge?

12 A. I don't know, because there were other people at

13 Pacific Bell also on the call that were taking notes.

14 Q. You didn't create --

15 A. Oh, no, I took notes, too.

16 Q. So you had some notes somewhere?

17 A. Right.

18 Q. And who else participated in those calls from

19 Pacific Bell?

20 A. Sometimes there was different people. Ann Long,
21 sometimes.

22 Q. A-n-n, L-o-n-g?

23 A. Yeah. Gracie Gutierrez was on them before.

24 Leslie Wood had been on some before, not all. Penny

25 Baxter had been involved in some. As time went on, Kathy
0038

1 Flynn Miles had been involved in them before and Kathy

2 Korona and Debby Nightingale. And there might be more

3 people that I am not thinking of at the moment.

4 Q. But any of those individuals may have made notes

5 of the conference calls or meetings with MCI

6 representatives?

7 MR. KOLTO-WININGER: Vague as worded. May have

8 made, it's possible. Why don't you reword it.

9 Go ahead and answer it, if you know.

10 THE WITNESS: I am assuming, maybe.

11 MR. McDONALD: Q. Did you see them? Were you

12 in the same room with them?

13 A. Sometimes we were in conference calls with

14 people, so I don't know whether or not --

15 MR. KOLTO-WININGER: I have no problems with

16 what you are trying to get at. It was just the way it was

17 worded, may have, it's possible.

18 THE WITNESS: Yes, there's usually notes, but

19 some people were in conference calls, I can't tell you

20 what they did with them.

21 MR. McDONALD: Q. But subsequent to these
22 calls, was there ever a document generated within Pacific
23 Bell to identify the issues that had been raised?

24 A. We, as RMC's, also have an issues document.

25 Q. So you would create a document?

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1 A. No.

2 Q. When you say we, as RMC's, have an issues
3 document, what do you mean?

4 A. The RMC's, certain people, would create the
5 document, different RMC's would do that. No, I didn't --
6 I wasn't one of them. I would give the information on
7 certain things that was not private to the carrier, and
8 whoever was in charge of this would do this for the week.

9 Q. Let me try to understand the process. There was
10 a system in place to try to create a written document that
11 identified problems that were being experienced from a
12 variety of carriers?

13 A. Yes.

14 Q. And that was the function that was tasked to an
15 individual RMC from week to week?

16 A. Yes.

17 Q. Did you ever have that function?

18 A. Yes, but I kind of messed that up, so I only did
19 it once, so I did not -- I had a problem with my computer.

20 Q. But, generally, from week to -- is it true that
21 on a weekly basis, one of the RMC's would write up, Here
22 is an issue list?

23 A. Yes.

24 Q. To your knowledge, is that documentation

25 maintained somewhere?

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1 A. Yes.

2 Q. Do you know where that is?

3 A. I believe it's on disk.

4 Q. Who has possession of that?

5 A. I believe a few people could have it.

6 Q. And they are?

7 A. RMC's.

8 Q. Who?

9 A. Josh Goodall could have it on the Sprint account

10 team. I may have a copy of it. I had problems with my

11 computer, that's why I am saying may.

12 Q. Anybody else?

13 A. I think Trish Cvetocac could have a copy of

14 it -- C-v-e-t-o-c-a-c -- and possibly some other RMC's who

15 have moved on to a different position.

16 Q. Now, is it a single document or is it a series

17 of documents that we are talking about?

18 A. It's different issues that we have worked on

19 that have been closed.

20 Q. Does this document have a name?

21 A. RMC's issues document, I believe it's called.

22 Q. Was there any other document created, to your

23 knowledge, within Pacific Bell that identified the issues

24 that were raised by carriers?

25 A. I am sure -- I mean, I would think that there
0041

1 would be at a higher level, yes. I have not personally

2 been involved in that and I don't know who would be.

3 Q. What is done with this RMC issues document when

4 it's created? Is it disseminated among all the RMC's?

5 A. Yes.

6 Q. Does it go to anyone else?

7 A. Yes.

8 Q. Who does it go to?

9 A. Michael Galligan.

10 Q. Who is he?

11 A. He is the product person, like the main product

12 person. He is also the liaison that works with the RMC's.

13 Q. Do you know why he received a copy of this

14 document?

15 A. Because we -- the RMC's are very busy, so he was

16 also going to help get these issues get taken care of and

17 go to the correct people. There was a products person,

18 since he is in charge of product, he kind of ran with

19 that.

20 Q. Was this document provided to anyone else

21 superior to you? I mean, you gave a list that started

22 with Michael Mallen and Kathy Flynn Miles and all the

23 other individuals. Is it shared with any of those other

24 people?

25 MR. KOLTO-WININGER: As far as you know.

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1 MR. McDONALD: Sure.

2 THE WITNESS: I don't know.

3 MR. McDONALD: Q. Why don't we talk about the
4 LISC for a little bit. Can you explain what the LISC is?
5 It's all caps, L-I-S-C, right?

6 A. Local Intersection Service Center, I believe is
7 the correct name.

8 Q. Physically, where is the LISC located?

9 A. 370 3rd Street on the third floor.

10 Q. That's in San Francisco?

11 A. Yes, it is.

12 Q. And how much space does it occupy, do you know?

13 A. Large areas.

14 Q. Do you know when it was formed, when it took
15 over that space?

16 A. Not exactly, no.

17 Q. Do you know if it was before February of 1996?

18 A. I believe so. I am not sure.

19 Q. How long have you worked with people at the
20 LISC?

21 A. Since I have been doing the RMC job.

22 Q. So since February of '96?

23 A. February, March. It was a little later than
24 that because MCI was not placing orders at that time.

25 Q. Who did you first deal with at the LISC when you
0043

1 first started working with people at the LISC?

2 A. A lot of different people. Do you want me to
3 start naming everybody? I'm sorry, but --

6 the live orders started, say, September, October, 1996,

7 were there individuals at the LISC that you primarily

8 interacted with during that period of time?

9 A. Yes.

10 Q. Who was that?

11 A. Gracie Gutierrez, Ann Long. I don't know what

12 time frame Gracie came, actually, but I definitely worked

13 with her. And then different service reps, depending on

14 what I needed. And also first level managers. Those are

15 all second level managers I mentioned so far.

16 Q. Back in September or October 1996, do you know

17 how many employees were at the LISC?

18 A. No, I don't.

19 Q. Did you ever physically go there to the LISC?

20 A. Yes.

21 Q. On what kind of -- how regular basis?

22 A. Regularly, daily.

23 Q. Where is your office relative to where the LISC

24 is?

25 A. Across the hall.

0045

1 Q. So on a daily basis, you'd walk over to talk to

2 the people there?

3 A. Yes.

4 Q. During September and October, do you know who

5 headed up the LISC?

6 A. Ann Long.

7 Q. Do you know anyone else who had a management

8 position at the LISC besides Ann Long?

9 A. Second level management? There's different --
10 or any management?

11 Q. However Pacific Bell is organized, just to the
12 extent that you are aware of.

13 A. I don't know time frames, no, I don't.

14 Q. Back when the first live orders started coming
15 in, Ann Long was, to your knowledge, the most senior
16 person at the LISC?

17 A. No, because there was Jeff Phelps, too, who was
18 Ann Long's boss.

19 Q. And he was at the LISC?

20 A. He was -- when you say at the LISC, do you mean
21 sit at the LISC?

22 Q. Sort of physically located there, I was asking.

23 A. No.

24 Q. But in terms of people who are physically
25 located at the LISC, Ann Long was the most senior person
0046

1 that you are aware of? This is back, September or
2 October.

3 A. That I am aware of, yeah.

4 Q. Do you know what Jeff Phelps' title is or was?

5 A. No, I do not.

6 Q. Is he still Ann Long's boss?

7 A. No, he is not.

8 Q. Has anyone else replaced him?

9 A. Yes.

10 Q. Do you know who that person is?

11 A. No, I don't.

12 Q. Do you know when that occurred?

13 A. A few months back.

14 Q. December, January?

15 A. I am not sure of the exact date. I mean, can I

16 back up, because I am not sure of the person. I know

17 there's two people and I don't know which one actually

18 replaced, if that's the question. There's people there,

19 yes.

20 Q. There are people superior to Ann Long?

21 A. Yes.

22 Q. Are they at the LISC now?

23 A. Yes.

24 Q. And who is that? You don't know their names,

25 but you know there are two people?

0047

1 A. Don Griffin and I don't know that the other one

2 is at the LISC. John Stankey.

3 Q. Going back to September of 1996, when MCI's live

4 orders started coming in, do you know approximately how

5 many employees were at the LISC at that time?

6 A. No, I don't.

7 Q. You were going there on a daily basis. Is the

8 LISC located in a single room?

9 A. No, it's not.

10 Q. How is it configured?

11 A. It's broken up between facility base, resale.

12 There's other -- I believe that there's other LISC's, not
13 at that time.

14 Q. We are talking about the resale, LISC for
15 resale.

16 A. Right.

17 Q. Ann Long would be the best person to talk to
18 about the staffing at the LISC?

19 A. Yes.

20 Q. Do you know what the employees at the LISC do on
21 the resale side?

22 A. No. Which employees? Everybody does something
23 different is what I am trying to get at.

24 Q. Do you know if at the LISC the employees are
25 broken up into groups or divisions or different functions?
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1 A. I don't know their exact functions, no, I do
2 not.

3 Q. But is it true that you served as a liaison
4 between MCI and the LISC for the resale function?

5 A. Yes, that's true.

6 Q. And in connection with that, didn't you contact
7 the LISC to try to work out problems that were developing
8 with MCI's orders?

9 A. That's true.

10 Q. And on a regular basis, would you go over to the
11 LISC?

12 A. Yes, I did.

13 Q. And you would discuss the problems with

14 individuals who worked at the LISC?

15 A. Usually high level managers such as Ann Long,

16 Gracie Gutierrez.

17 Q. You generally didn't work with the line level

18 people who were performing the various functions; is that

19 right?

20 A. Are you saying typing the orders?

21 Q. Whatever --

22 A. There is a lot of different things that go on at

23 the LISC is what I am trying to get at.

24 Q. Can you give me a general description of what

25 you saw go on at the LISC?

0049

1 A. There is service reps that write orders, people

2 that do CSR's, people that scan the orders. I have never

3 sat down and watched for the whole day certain people. I

4 talk to people that I need to talk to, but I haven't sat

5 in the LISC to know exactly how it -- how the procedure

6 goes.

7 Q. So, in your training, you were never walked

8 through the functions of the LISC personnel so that you'd

9 be knowledgeable about what each of the various people at

10 the LISC would be doing in this resale function?

11 A. No.

12 Q. Were you ever apprised of the systems that were

13 used at the LISC to effectuate the ordering process?

14 A. Yes, some of them.

15 Q. When did you learn about those systems?

16 A. Okay. Depending on which systems.

17 Q. You tell me what systems.

18 A. Cleo, that kind of thing?

19 Q. Yes.

20 A. Or orders verification, in the beginning when it
21 was available. I don't remember the time frame. Some of
22 the other systems I know about from me being a rep in the
23 past, so I didn't really need to sit down. I have a lot
24 of rep knowledge.

25 Q. Is that because the functions that the personnel
0050 1 at the LISC were performing were similar to functions that

2 you had fulfilled earlier?

3 A. Yes, in some ways, I probably did more
4 complicated orders.

5 Q. Are you familiar with the process that the LISC
6 goes through as an order -- we will go back to the
7 September, October time frame, when an order came in from
8 MCI how that would be processed at the LISC?

9 A. Yes, and they went through that on workshops,
10 too.

11 Q. Can you describe that for me? Tell me how the
12 order, say, September of 1996 order for MCI would come in?
13 How would it be handled? What would the process be?

14 A. It would come in over a fax machine. Somebody
15 would pull it off the fax and, I believe, it went to a
16 scanner and then sent out to a rep or an order writer.

17 Q. And so someone would notice that a sheet had

18 come in over a fax machine and they would run it through a
19 scanner. Would that be to input the data?

20 A. No. They would scan the order out, just look at
21 it, I believe, and make sure that it was okay to go to the
22 rep, the first check.

23 Q. Oh, the scanner is an individual?

24 A. Exactly, it's people.

25 Q. And that's somebody to make sure that all the
0051
1 boxes are filled in?

2 A. You know, I don't know just how far they go.

3 Q. So an individual does some kind of first
4 examination of the order and then is then passed on to a
5 second person?

6 A. Yes.

7 Q. Who is an order writer?

8 A. Or service rep, the first person could have been
9 a service rep or an order writer, too. Everybody had --
10 they had different jobs.

11 Q. And then what does that person do, the order
12 writer?

13 A. They could take the order.

14 Q. And that's on a computer screen?

15 A. Yes.

16 Q. For Pacific Bell systems?

17 A. Yes.

18 Q. What would happen next after the order had been
19 typed up?

20 A. There's different parts of the order. It's --

21 Q. Back up a second, I'm sorry.

22 Is there a simplest type of order, there may be

23 multiple orders of migrate as is, migrate as specified,

24 that kind of thing. Can we talk about the simplest type

25 of order?

0052

1 A. MCI didn't use the simplest type of order.

2 Migration as specified would be the main one.

3 Q. So would the migration as specified -- what

4 would happen next?

5 A. I did not sit at the LISC and watch somebody

6 type it. I don't know exactly what happened. I know they

7 typed it.

8 Q. After the order writer finished the function

9 that the order writer was supposed to perform, do you know

10 what happened next?

11 A. No, I don't.

12 Q. And, thereafter, do you know what happened with

13 orders coming from MCI? You are not sufficiently familiar

14 with the process?

15 A. I don't think I understand this question, I

16 don't mean to sound --

17 Q. I am just trying to find out, based on what you

18 know. If your statement is you don't know, that's fine.

19 I am just trying to -- you shouldn't assume that there's

20 something wrong if your answer is you don't know.

21 A. Then I don't know exactly what goes on with the